

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

DANIEL C. FLINT et.al.,	:	
	:	No. 3:19-cv-00189-FDW-DCK
Plaintiff,	:	
	:	
v.	:	
	:	
ALLY FINANCIAL INC., et.al.,	:	
	:	
Defendants.	:	
	:	
	:	

**JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANT
ALLY FINANCIAL INC. TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Ally Financial Inc. (“Ally”) and Plaintiff Daniel C. Flint (“Plaintiff,” collectively with Ally, the “Parties”), through counsel, hereby jointly move for an extension of time for Ally to respond to Plaintiff’s Amended Class Action Complaint (“Complaint”). In support of this Joint Motion, the Parties state the following:

1. Plaintiff filed the Complaint on April 18, 2019 [Dkt. No. 3].
2. Ally was served with the Complaint on May 13, 2019. Therefore, Ally’s responsive pleading is currently due June 3, 2019.
3. Ally requests additional time to respond to Plaintiff’s Complaint as Ally’s undersigned counsel was recently retained and continues to review the allegations in Plaintiff’s Complaint.
4. Counsel for Ally conferred with Plaintiff on May 24, 2019.
5. Plaintiff consented to a thirty (30) day extension of time for Ally to file a response to Plaintiff’s Complaint.
6. This is Ally’s first request for an extension with respect to Plaintiff’s Complaint.

7. Such extension shall not prejudice Plaintiff and will not unduly delay this litigation.

WHEREFORE, Defendant Ally Financial Inc. and Plaintiff Daniel C. Flint, respectfully request an extension of time for Ally Financial Inc. to serve its responsive pleading up to and including July 3, 2019.

Dated: May 30, 2018

Respectfully submitted,

/s/Daniel C. Flint

Daniel C. Flint
Bar ID 50000
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